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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JEFFREY M. GOLDMAN,  Plaintiff,  v.  SOL GOLDMAN INVESTMENTS LLC, SOLIL MANAGEMENT, LLC, and JANE H. GOLDMAN,  Defendants.	DOCKET NO.: 1:20-cv-6727-AJN  CIVIL ACTIONs  <b>MOTION TO DISMISS AMENDED COMPLAINT AS TO SOL GOLDMAN INVESTMENTS LLC, PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 12(b)(1) AND 12(b)(6)</b>
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To:  
D. Maimon Kirschenbaum, Esq.  
Joseph & Kirschenbaum LLP  
32 Broadway, Suite 601  
New York, New York 10004

**PLEASE TAKE NOTICE** that on Wednesday, January 20, 2021 at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant Sol Goldman Investments LLC (“SGI”) will move before this Court, at the U.S. Courthouse, 40 Foley Square, Room 2102, New York, New York 10007, for an Order dismissing the Amended Complaint filed by Plaintiff Jeffrey M. Goldman as to SGI for lack of subject-matter jurisdiction and failure to state a claim upon which relief may be granted, pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6);

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, SGI will rely upon the Memorandum of Law in letter form and the Proposed Form of Order submitted herewith;

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Rule 6.1(b), any opposing affidavits and answering memorandum shall be served within fourteen days after service of the moving papers and any reply affidavits and memoranda of law shall be served within seven days after service of the answering papers; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested in the event opposition is filed.

Dated: Woodland Park, New Jersey  
December 17, 2020

ANSELL GRIMM & AARON, P.C.

By: \_\_\_\_\_

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